

AO 91 (Rev. 11/11) Criminal Complaint

Officer:

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Scott Hall

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Nixo Ivan FLORES-SOSA

Case: 2:25-mj-30293

Assigned To : Unassigned

Case No. Assign. Date : 5/6/2025

Description: CMP USA V. FLORES-SOSA(DJ)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 1, 2025 in the county of Washtenaw in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

8 U.S.C. 1326(a)

*Offense Description*

Unlawful Re-Entry Following Removal from the United States

This criminal complaint is based on these facts:

On or about May 1, 2025, in the Eastern District of Michigan, Southern Division, Nixo Ivan FLORES-SOSA, an alien from Honduras, was found in the United States after having been denied admission, excluded, deported, and removed there from on or about September 5, 2018, and not having obtained the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: May 6, 2025City and state: Detroit, MI

*Complainant's signature*Scott Hall, Deportation Officer*Printed name and title*

*Judge's signature*Kimberly Altman, U.S. Magistrate Judge*Printed name and title*

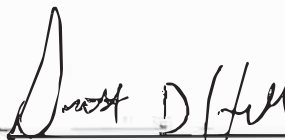
**AFFIDAVIT**

I, Scott Hall, declare the following under penalty of perjury:

1. I am a Deportation Officer employed with Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) of the United States Department of Homeland Security (DHS) at the Detroit Field Office. I have been employed in this capacity since September 2009. I am currently assigned to the Detroit ICE-ERO Fugitive Operations team.
2. This affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint and an arrest warrant for Nixo Ivan FLORES-SOSA, an alien who has previously been removed from the United States on or about September 5, 2018, at or near Mesa, Arizona, and was thereafter found in the United States on or about May 1, 2025, without having obtained the express consent or permission of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission, all in violation of Title 8, United States Code, Section 1326(a).
3. The information contained in this affidavit is based upon my personal knowledge and observations, information provided by other law enforcement personnel to include ICE ERO Deportation Officers, and database record checks. I have also reviewed records from the official immigration file and system automated data relating to FLORES-SOSA. I have not included every fact known to law enforcement related to this investigation.
4. FLORES-SOSA is a thirty-two-year-old citizen and a native of Honduras who last entered the United States on an unknown date, at an unknown place, without being inspected and admitted or paroled by an immigration officer.
5. On or about August 12, 2018, United States Border Patrol (USBP) arrested FLORES-SOSA after he had unlawfully entered the United States of America near Sasabe, Arizona from Mexico at a time and place other than as designated by the Secretary of Homeland Security of the United States of America. USBP processed FLORES-SOSA as an Expedited Removal.

6. On September 05, 2018, ICE removed FLORES-SOSA from the United States via ICE Air Operations in Mesa, Arizona.
7. On September 03, 2024, the Washtenaw County Sheriff's Office arrested FLORES-Sosa for the offense of "Domestic Violence". This charge is currently pending.
8. On May 01, 2025, the ICE/HSI Task Force Team traveled to the area of 4XX W. Michigan Avenue, Ypsilanti MI 48197 in search of Nixio Ivab FLORES-SOSA, who is the target of an approved Field Operations Worksheet. At approximately 10:30 a.m., a male subject matching the physical description of FLORES-SOSA departed the building in a beige-colored Dodge Stratus. Officers initiated a vehicle stop at or near W. Michigan Avenue and Elder St. in Ypsilanti, MI to identify the Hispanic male based on the reasonable suspicion that this individual matched the description of the target seen exiting the building. Officers identified themselves, contacted the driver and requested identification.
9. FLORES-SOSA provided an International Driver's License with the name Nixio Ivan FLORES-SOSA. Officers attempted to place FLORES-SOSA under arrest based on probable cause that he was an alien who had unlawfully re-entered the United States after having been previously removed. FLORES-SOSA refused to answer questions and became very irate when ICE officers explained in Spanish who they were and that there is a warrant for his removal. FLORES-SOSA forcibly resisted officers by grabbing on to the steering wheel, bracing his legs to the inside of the vehicle, and encouraged local bystanders to come to his aid. He threatened to kick out the back passenger window of the vehicle. FLORES-SOSA became completely noncompliant and had to be forcibly removed from the vehicle, placed on the ground, and cuffed with his hands behind his back.
10. Deportation Officers transported FLORES-SOSA to the Detroit Field Office for processing. The arrest and subsequent detention of FLORES-SOSA was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.

11. FLORES-SOSA'S fingerprints and photograph were captured and searched in the ICE/FBI systems. The fingerprints returned with a positive match for Nixio Ivan FLORES-SOSA, a native and citizen of Honduras who had previously been removed from the United States.
12. A review of FLORES-SOSA's immigration file, record checks, and queries in the U.S. Department of Homeland Security databases confirmed that FLORES-SOSA did not obtain the permission or express consent from the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission to the United States following his removal on September 05, 2018.
13. On May 01, 2025, ICE-ERO served FLORES-SOSA with Form I-871, Notice of Intent/Decision to Reinstate Prior Order.
14. Based on the above information, I believe there is probable cause to conclude that Nixio Ivan FLORES-SOSA is an alien who has previously been removed from the United States on or about September 05, 2018, at or near Mesa, Arizona and was thereafter found in the United States on or about May 01, 2025 in the Eastern District of Michigan, without first having obtained the express consent or permission of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission to the United States, all in violation of Title 8, United States Code, Section 1326(a).



Scott Hall, Deportation Officer  
Immigration and Customs Enforcement

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



Kimberly Altman

U.S. Magistrate Judge